

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SUN CHENYAN)	
)	
Plaintiff,)	Case No. 20-cv-220
)	
v.)	Judge Jorge L. Alonso
)	
THE PARTNERSHIPS AND)	Mag. Judge M. David Weisman
UNINCORPORATED)	
ASSOCIATIONS IDENTIFIED ON)	
SCHEDULE "A")	
)	
Defendants.)	
_____)	

PLAINTIFF SUN CHENYAN'S MOTION FOR LEAVE TO FILE UNDER SEAL

Plaintiff SUN CHENYAN files this Motion pursuant to Local Rules 5.7 and 26.2 requesting leave to file the following documents under seal: (1) Schedule A attached to the Complaint, which includes a list of the Defendants' online marketplace accounts, [Doc. 4] and (2) screenshot printouts, attached to the Declaration of Sun Chenyan, [Doc. 6] showing the Defendants' active online marketplace accounts. [Docs. 7-11] In this action, Plaintiff is seeking expedited discovery in order to facilitate her investigation and in anticipation of temporary *ex parte* relief based on an action for trademark infringement and counterfeiting, false designation of origin, copyright infringement and violation of the Illinois Uniform Deceptive Trade Practices Act.

Sealing this portion of the file is necessary to prevent Defendants from learning of these proceedings prior to the completion of Plaintiff's investigation and subsequent application for

and execution of a temporary restraining order to include a temporary asset restraint. If Defendants were to learn of these proceedings prematurely, the likely result would be the destruction of relevant documentary evidence and the hiding or transferring of assets which would frustrate the purpose of the underlying law and would interfere with this Court's power to grant relief. Once Plaintiff has completed her investigation, the anticipated temporary restraining order has been served on the relevant parties and the requested actions are taken, Plaintiff will file an Amended Complaint which identifies Defendants and their online marketplace accounts and will move to unseal these documents.

Respectfully submitted this 14th day of January, 2020,

/s/ L. Ford Banister, II
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